

# **EXHIBIT G**



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

FCS ADVISORS, LLC,

Plaintiff,

—*against*—

THEIA GROUP, INC., d/b/a “THORIAN  
GROUP” and/or “CYPHERIAN”;

THEIA AVIATION, LLC; and

THEIA HOLDINGS A, INC., d/b/a “THORIAN  
HOLDINGS,”

Defendants.

21 Civ. 6995

**EXPEDITED FIRST DOCUMENT REQUESTS  
AND INTERROGATORIES TO DEFENDANTS**

Plaintiff FCS Advisors, LLC (“FCS”) hereby requests, pursuant to Rule 34, that Defendants produce, within 10 days of service, at the offices of Steptoe & Johnson LLP, 1114 Avenue of the Americas, New York, New York 10036, all documents described below that are in their possession, custody, or control, or in the possession, custody or control of its agents or representatives, in accordance with the following instructions and definitions.

FCS further hereby requests, pursuant to Rule 33, that Defendants furnish to the undersigned (Charles Michael, Steptoe & Johnson LLP, 1114 Avenue of the Americas, New York, New York 10036), within 10 days of service, written answers under oath to the following interrogatories, in accordance with the following instructions and definitions.

**DEFINITIONS**

1. FCS incorporates the definitions in Local Rule 26.3.



2. “Affiliate” means, with respect to a specified person or entity, any other person or entity that directly, or indirectly through one or more intermediaries, controls or is controlled by, or is under common control with, the person or entity specified.

3. “Describe in detail” means provide a narrative statement or description, phrased in specifics, of the facts or matters to which the interrogatories have reference, including, but not limited to, an identification of all persons, communications, acts, transactions, events, dates, agreements, recommendations, and documents necessary to make such statement or description complete.

4. “Relating to” means relating to, reflecting, concerning, referring to, describing, evidencing, or constituting.

5. “Theia” refers to Defendants Theia Group, Inc., Theia Aviation, LLC, and Theia Holdings A., Inc., and includes Affiliates employees, agents and others acting or purporting to act of their behalf.

6. The “Thorian and Cypherian Entities” refers to Thorian Group, Incorporated, Thorian Holdings Group A Incorporated, Cypherian LLC (formerly known as Cypherian Corp.), and any other similarly-named entity formed by executives, principals or investors of Theia.

### **INSTRUCTIONS**

1. This Request includes all documents in your possession, custody or control, regardless of where such documents are located.

2. A copy of a document that varies in any way whatsoever from the original or from any other copy of the document, whether by reason of handwritten or other notation or any omission, shall constitute a separate document and must be produced, whether or not the original of such document is within your possession, custody, or control.



3. All documents must be produced in their entirety, including all attachments and enclosures, and in their original folder, binder or other cover or container. Whenever a document or group of documents is removed from a file folder, binder, file drawer, file box, notebook, or other cover or container, a copy of the label of such cover or other container must be attached to the document or group of documents.

4. If you object to any portion of this Request, state with specificity the grounds for each such objection and produce all documents and submit all answers responsive to the remainder of the Request.

5. If you claim privilege or immunity with respect to any document or information, state the nature and basis of the privilege or other ground asserted as justification for withholding such information in sufficient detail to permit the Court to adjudicate the validity of the claim. This includes, at a minimum: (a) the date of the document or communication; (b) the author or speaker; (c) the addressee(s) or person to whom the communication was directed; (d) all other recipients or persons receiving the communication; (e) the type of document (letter, report, etc.) or communication; (f) the general subject matter of the document or communication; and (g) the specific privilege claimed.

6. This Request is continuing in nature. Any information or documents called for by this Request that you obtain subsequent to the service of your response to this Request, shall promptly be supplied in the form of supplemental answers and/or document productions pursuant to Rule 26(e).

7. All documents are to be produced as they are kept in the usual course of business so that FCS can ascertain the files in which they were located, their relative order in such files and how such files were maintained.



8. Objections must indicate “the grounds for objecting to the request, including the reasons,” Fed. R. Civ. P. 34(b)(2)(B), specify when the documents will be produced (if they are not produced with the objections), *id.*, and, for each objection, must “state whether any responsive materials are being withheld on the basis of that objection.” Fed. R. Civ. P. 34(b)(2)(C).

9. All documents responsive to this Request that are maintained in the usual course of business in electronic format shall be produced in their native format (or another format agreed by the parties) along with software necessary to interpret such files if such software is not readily available. All such documents shall be accompanied by a listing of all file properties, commonly known as metadata, concerning such documents, including all information concerning the date(s) and recipient(s) of the document, the location and content of any attachment(s) to the document, and the location and content of any information imbedded or annotated in the document.

10. If you cannot answer an interrogatory in full, state why and furnish all available information. Estimates should be given when, but only when, exact information cannot be supplied. Identify any estimates as such, and be as precise as possible. Identify the sources of, and methods of deriving, each estimate.

11. Do not refuse to respond to any Request (or subpart of any Request) on the ground that it is ambiguous, or that the definitions or instructions are ambiguous. Instead, identify the language you believe is ambiguous, the interpretation of the ambiguous language you believe is most reasonable, and respond using that interpretation.



12. Answer the interrogatories in a manner that is as precise and exhaustive as possible, and do not answer in a manner (*e.g.*, “among other things,” “including”) that fails to completely inform FCS of the matters at issue.

**DOCUMENTS REQUESTED**

1. Monthly statements from all bank, brokerage or other financial accounts from June 2020 through the present for all such owned or used by Theia, or by the Thorian and Cypherian Entities.

2. Financial statements (whether audited or unaudited) for each month and each quarter since 2019.

3. Documents relating to the formation and purpose of the Thorian and Cypherian Entities.

4. All documents and communications relating to any transaction of any kind between, on the one hand, Theia, and, on the other, any of the Thorian and Cypherian Entities.

5. All documents and communications reflecting any transaction (except ordinary course transaction such as salary payments) between, on the one hand, Theia or any of the Thorian and Cypherian Entities, and, on the other, any executives, principals or investors in Theia.

6. All contracts:

- (a) for the design and/or construction of satellites;
- (b) with investors or lenders (including contract for any PAC, PIPE, debt, mezzanine, hybrid, or other financing or investment transactions); or
- (c) with any customers or partners (including joint venture partners).



**INTERROGATORIES**

1. Identify all bank, brokerage or other financial accounts Theia, or the Thorian and Cypherian Entities, have owned or used since June 2020.
2. Describe in detail the nature and purpose of the Thorian and Cypherian Entities, and their relationship and business dealings with Theia.
3. Identify (a) members of the Board of Directors for Theia since January 2020 to the present or any part thereof; and (b) of the persons listed as members of the “Management Team” in the written presentation to FCS dated March 2021.

Dated: Washington, D.C.  
August 19, 2021

/s/ Charles Michael  
Charles Michael  
1114 Avenue of the Americas  
New York, NY  
(212) 506-3900  
cmichael@steptoe.com

STEPTOE & JOHNSON LLP

Filiberto Agusti  
Joshua Taylor\*  
Mark Murphy\*  
1330 Connecticut Avenue, N.W.  
Washington, D.C. 20036  
(202) 429-3000  
fagusti@steptoe.com  
jtaylor@steptoe.com  
mmurphy@steptoe.com

*\*pro hac vice* application forthcoming

*Counsel for Plaintiff FCS Advisors, LLC*